

STATE OF NEW HAMPSHIRE

HILLSBOROUGH, SS.
SOUTHERN DISTRICT

SUPERIOR COURT
CASE NO. 226-2021-CR-00126

State of New Hampshire

v.

Julie A. Introcaso

DEFENDANT'S ASSENTED-TO MOTION TO AMEND BAIL CONDITIONS

The Defendant, Julie A. Introcaso ("Ms. Introcaso"), by and through counsel, McLane Middleton, Professional Association, hereby files an Assented-to Motion to Amend Bail Conditions. In support of this motion, Ms. Introcaso states as follows:

1. Ms. Introcaso has family college graduation events to attend in Ithaca, New York and in Colorado.
2. As a result, Ms. Introcaso requests an amendment of her bail conditions to allow her to travel within the continental United States to attend the family graduation events.
3. The State assents to the relief requested in this motion.

WHEREFORE, the Defendant Julie A. Introcaso respectfully requests that this Honorable Court:

- A. Amend her bail conditions to allow her to travel within the continental United States to attend family graduation events in Ithaca, New York and Colorado; and
- B. Grant such other and further relief as equity and justice require.

Granted



Honorable Charles S. Temple
May 21, 2021

Clerk's Notice of Decision
Document Sent to Parties
on 05/24/2021

Respectfully submitted,

JULIE A. INTROCASO

By her Attorneys,

McLANE MIDDLETON
PROFESSIONAL ASSOCIATION

Dated: May 21, 2021

By: /s/ Michael A. Delaney

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CERTIFICATE OF SERVICE

I hereby certify that on May 21, 2021, I served Defendant's Assented-to Motion to Amend Bail Conditions by filing through this Court's electronic filing system, to the following counsel of record:

Geoffrey Ward
New Hampshire Department of Justice
33 Capitol Street
Concord, NH 03301
geoffrey.ward@doj.nh.gov

/s/ Amanda E. Quinlan

Amanda E. Quinlan